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July 18, 2025

## EXHIBIT 6

*Via Email and U.S. Mail*

Amanda Fox Perry  
Fox McKenna  
14 Ridge Square NW  
Third Floor  
Washington, DC 20016  
[amanda@foxmckenna.com](mailto:amanda@foxmckenna.com)

Re: *Elyse McKenna v. Robert F. Riley, et al*  
USDC Case No. 24-cv-12347

Dear Ms. Fox Perry:

I am writing to address significant deficiencies in your 22-page response to the Riley Parties' subpoena. As it stands, the production is plainly incomplete. Unless these deficiencies are promptly corrected, we will have no choice but to seek appropriate relief from the Court.

**Topics 1, 2, 5, and 6:** These requests seek all communications and documents—whether by email, text, or other means—between you and McKenna or anyone else concerning Robert Riley, Riley & Hurley, P.C., or this litigation. Your response includes none. That is not credible. Ms. McKenna's own complaint references communications with you about Mr. Riley, and you personally attended multiple proceedings and events involving Mr. Riley or this matter. If you are withholding responsive material based on privilege, Rule 45(e)(2) requires that you provide a privilege log. You have not done so. Please produce all responsive documents and a privilege log.

**Topics 3 and 4** relate to communications about the PHPA and the June 2024 PHPA conference that you attended. You have produced only two documents, both of which appear to selectively excerpt text messages referencing "hockey" without including the full conversation. In addition, you appear to have redacted names without any legal justification or explanation. This sort of selective and redacted production is improper. Again, if privilege is claimed, you are required to support that claim with a privilege log. Please correct this deficiency promptly.

**Topic 7** concerns documents related to Ms. McKenna's residence, whether in Michigan or elsewhere, including materials reflecting her maintenance of a Michigan law practice. You have produced a small number of selectively edited text messages, none of which are with Ms. McKenna herself. That, too, strains credulity given your close personal and professional relationship with her during the relevant time frame. Furthermore, your own firm's website references Ms. McKenna's active Michigan law practice, yet you have produced no documents reflecting this. Please produce complete, unredacted versions of the previously-submitted materials along with all additional responsive materials that have been withheld.

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Please treat this letter as our final attempt to resolve these issues without judicial intervention. We request that you supplement your production and provide a privilege log by Friday, July 25, 2025. Otherwise, we will seek relief from the Court.

Very truly yours,

*/s/Thomas J. Davis*

Thomas J. Davis

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